

Please respond by Friday, March 28, 1997.

Thanks,
Carlos de la Fuente
(972) 918-8075

cc: Marcia Weaver (AT&T)
Gary Madole (AT&T)
Patti Wagner (SWBT)

ATTACHMENT 17



"The One to Call On".

March 31, 1997

Robert Banneker
Account Manager
Regional Sales

Mr. Carlos de la Fuente
AT&T
5429 LBJ Freeway
Suite 740
Dallas, Texas 75240

Post-it Fax Note	7571	Date	# of pages 2
To	Carlos de la Fuente	From	
Co./Dept.		Co.	
Phone #		Phone #	
Fax #	972-968-8072	Fax #	

Dear Carlos:

This is in response to your E-mail of Tuesday, March 25, 1997, regarding UNE test access clarification in Texas. The answers to your questions are as follows:

Q(1a). Will SWBT still be able to test the loop if the UNE elements (loop & switch port) are ordered without test access?

A(1a). SWBT will be able to test but testing will require manual intervention.

Q(1b). If the answer is no, why would an order (UNE elements with loop and switch port combination) ever be placed without test access?

A(1b). The answer to (a) was yes. The ordering of UNE elements, with or without test access, is a business decision AT&T would have to make.

Q(1c). Assuming this scenario exists (UNE loop and switch port) without test access, what is the cost of the loop in this environment?

A (1c). Pricing for UNE elements, with and without test access, is still under negotiation.

Q (2). In a scenario where UNE is ordered (loop and switch port) with test access, what is the definition of "slight"?

A(2). SWB would anticipate an average of 30 minutes or less.

Regional Sales

8-E-64
1010 Pine
St. Louis, Missouri 63101

Phone 314 331-1448
Fax 314 331-9402

Please call me if you have any questions.

Sincerely,



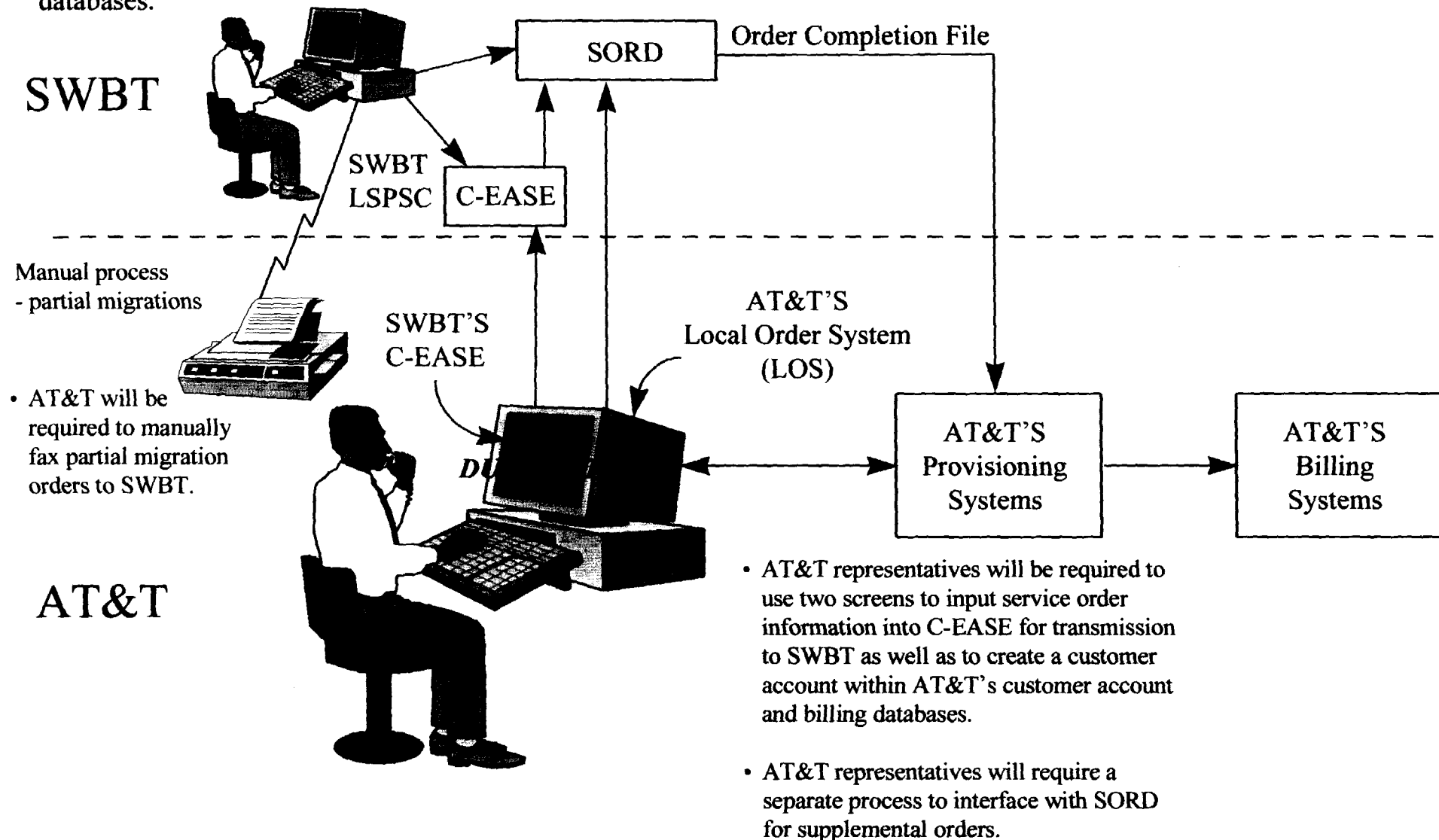
cc: Patty Flores
Randy Gurley
Terry Lindsay
Patty Wagner

ATTACHMENT 18

Consumer EASE

Use of SWBT's EASE system will not provide AT&T with non-discriminatory access to the OSSs it provides itself.

- SWBT representatives use one screen to interface with EASE, SORD and SWBT's internal customer account and billing databases.



ATTACHMENT 19

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Attachment 19

In the Matter of the Petition)
by AT&T Communications of the)
Southwest, Inc., for Compulsory)
Arbitration of Unresolved Issues) Docket No.
With Southwestern Bell Telephone) 97-AT&T-290-ARB
Company pursuant to 252(b) of the)
Telecommunications Act of 1996.)

V O L U M E 3
T R A N S C R I P T
O F
ARBITRATION PROCEEDINGS.

held on the 17th day of January, 1997, commencing
at 9:10 o'clock a.m. at the Kansas Corporation
Commission, 1500 Southwest Arrowhead Road,
Topeka, Shawnee County, Kansas, before Martha
Cooper, Arbiter.

CURTIS, SCHLOETZER, HEDBERG, FOSTER & ASSOCIATES
Certified Shorthand Reporters
112 West 6th Street, Suite 201
Topeka, Kansas 66603
(913) 232-0416

APPEARANCES

On Behalf of the Applicant,
AT&T Communications of the Southwest:

Mr. Robert A. Fox
Ms. Dana A. Bradbury Green
FOULSTON & SIEFKIN
Attorneys at Law
534 South Kansas Avenue
Topeka, Kansas 66603

Ms. Kathleen M. LaValle
COHAN, SIMPSON, COWLSHAW & WULFF, L.L.P.
Attorneys at Law
350 North St. Paul Street
2700 One Dallas Centre
Dallas, Texas 75201-4283

Ms. Gloria Salinas
LAW OFFICE OF GLORIA SALINAS
Attorneys at Law
907 South Congress
Austin, Texas 78704

On Behalf of Southwestern Bell
Telephone Company:

Mr. William R. Drexel
Mr. Michael C. Cavell
SOUTHWESTERN BELL TELEPHONE COMPANY
220 East Sixth Street
Room 515
Topeka, Kansas 66603

Also Present as Advisory Counsel:

Ms. Eva Powers
Mr. Stephen Kukta
Ms. Susan Stanley
Assistants General Counsel
KANSAS CORPORATION COMMISSION
1500 Southwest Arrowhead Road
Topeka, Kansas 66604

I N D E XW I T N E S S E SOn Behalf of AT&T,DANIEL RHINEHART:

Direct Examination by Ms. LaValle-----685

Prefiled testimony-----659

ROBERT P. FLAPPAN:

Recross Examination by Mr. Cavell-----690

Redirect Examination by Ms. LaValle-----859

On Behalf of Southwestern Bell,J. MICHAEL MOORE:

Direct Examination by Mr. Cavell-----549

Prefiled Testimony-----553

Cross Examination by Ms. LaValle-----554

Redirect Examination by Mr. Cavell-----628

Recross Examination by Ms. LaValle-----649

Questions by Ms. Powers-----655

1 Q. Right, okay, and one of the
2 nonrecurring cost studies that Southwestern Bell
3 is using or proposing in this proceeding is one
4 that has to do with service ordering. Isn't that
5 right?

6 A. That is correct.

7 Q. And if you can remember just in general
8 terms, Mr. Moore, am I right that the assumption
9 built into this service order cost that you're
10 gonna charge the LSP, it assumes that the labor
11 time involved will be about 30 minutes. Is that
12 right?

13 A. To the best of my recollection, that's
14 about right.

15 Q. And the kind of activity that's going
16 to be undertaken in those 30 minutes by a
17 Southwestern Bell employee includes negotiation,
18 formatting, reviewing and typing the order. Does
19 that sound right?

20 A. That sounds close.

21 Q. Am I also right, Mr. Southwestern -- am
22 I also right, Mr. Moore, that Southwestern Bell
23 does not take into consideration approximating
24 that 30 minute time any timesaving or efficiency
25 that might be recognized when electronic service

1 order interfaces are in place?

2 A. That is correct. It is based upon the
3 manual methods available now.

4 Q. Do you expect, in your opinion, Mr.
5 Moore, that Southwestern Bell and AT&T will be
6 using a mechanized service order process?

7 A. I think in the long-run, probably in
8 several years, no. Immediately, yes.

9 Q. Immediately, you assume they will be
10 using a mechanized service order processing?

11 A. Mm-hmm -- (Nods head up and down) -- I
12 believe they will be using some manual methods.

13 Q. You don't believe in the next three
14 years, there will be any improvement in the --
15 over the manual methods currently in place for
16 service ordering?

17 A. There may be some, some improvements,
18 but my experience has indicated even when you
19 have mechanized methods, you, you have what is
20 called fallout and, consequently, you end up
21 reverting on some orders and a significant
22 portion of the orders to manual methods, so they
23 will not -- they will not go away a hundred
24 percent.

25 Q. But you do recognize or accept, Mr.

1 Moore, do you not, that changing to electronic
2 interfaces on a forward-looking basis does hold a
3 high potential for being able to cut down on the
4 time it would take to process a service order?

5 A. I would -- I would expect that much.
6 It wouldn't make sense to develop this system if
7 you didn't.

8 Q. Am I correct that the same service
9 order cost applies regardless of how many service
10 orders the LSP is asking Southwestern Bell to
11 process at the same time?

12 A. That is -- that is correct.

13 Q. So if I walk in with one service order
14 or I walk in with a hundred service orders,
15 you're still gonna charge me the same service
16 order cost for each of those.

17 A. That is correct.

18 Q. And what if I -- what if I order more
19 than one element, Mr. Moore? What if I order
20 let's say a loop and a switch, okay? Am I right
21 that you're gonna charge me a separate service
22 order for each of those elements?

23 A. You're now into the rates and, I mean,
24 what someone is going to charge, I'm not sure.
25 That's Mr. Springfield's area.

ATTACHMENT 20



5501 LBJ Freeway
P.O. Box 650345
Dallas, TX 75265-0345

Hand Delivered

April 23, 1996

Mr. Gary Juhl
District Manager - Strategic Planning
Southwestern Bell Telephone
One Bell Center, Room 34-Y-1
St. Louis, MO 63101

Dear Gary:

In our negotiations meeting in St. Louis on April 11, 1996 Southwestern Bell requested AT&T to provide order volume forecast to help you develop your operational processes, and interfaces to AT&T systems, with a throughput capacity that will provide AT&T a service level parity with Southwestern Bell. It was also mentioned by Rich Fowler that AT&T's order volume forecast will help ensure the development of systems and electronic interfaces. Attached is AT&T's estimate of average order volumes per month in a mature environment for each of the three states, namely TX, MO, and OK.

I would also like to re-iterate AT&T's need to know any factors that may be used by Southwestern Bell to derive estimates of trouble ticket volumes, and the like, from the order volumes estimates provided.

Please feel free to contact me at 214-669-4403 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Surendra Saboo".

Surendra Saboo
SW Region Infrastructure & Technical Planning, VP

Attachment

cc: R. Fowler

NEG 003475

ESTIMATE OF ORDER VOLUMES PER MONTH FOR TX, MO, & OK

Order Type	Texas	Missouri	Oklahoma
Consumer	40,000	13,000	9,000
Business	5,000	2,000	1,000
Total	45,000	15,000	10,000

Note: Order volumes include adds, deletes, and changes.

This preliminary information is provided solely as an aid to further negotiations in the Operations arena. It should not be construed as an intention by AT&T to make any purchase of facilities or services from Southwestern Bell, or a commitment by AT&T as to any present or future transaction. The information provided shall not bind either party unless the terms are included in a completed, written contract executed by each party's authorized representative; any investment made or action taken by either party in anticipation of a contract shall be at that party's sole risk and expense.

AT&T Proprietary
Subject to the terms and conditions of the
AT&T and SWB 4/1/96 Confidentiality and Nondisclosure Agreement

NEG 003476

ATTACHMENT 21



Surendra Saboo
SW Region Infrastructure
and Technical Planning
Vice President

Suite 570
5429 LBJ Freeway
Dallas, TX 75240
214 669-4403

Hand Delivered

June 11, 1996

Mr. Gary Juhl
District Manager - Strategic Planning
Southwestern Bell Telephone
One Bell Center, Room 34-Y-1
St. Louis, MO 63101

Dear Gary:

In our Core Negotiations Team meeting in St. Louis on May 30, 1996 I mentioned that AT&T's order volume forecast, to help you develop your operational processes and interfaces to AT&T systems, has increased significantly from the estimates provided to you earlier in a letter dated April 23, 1996. Attached is AT&T's revised estimate of average order volumes per month for each of the three states, namely TX, MO, and OK.

Please feel free to contact me at 214-669-4403 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Surendra Saboo".

Surendra Saboo

Attachment

cc: R. Fowler

NEG 008068

ESTIMATE OF ORDER VOLUMES PER MONTH FOR TX, MO, & OK

Order Type	Texas	Missouri	Oklahoma
Consumer	82,000	24,000	15,000
Business	8,000	3,000	2,000
Total	90,000	27,000	17,000

Note: Order volumes include adds, deletes, and changes.

This preliminary information is provided solely as an aid to further negotiations in the Operations arena. It should not be construed as an intention by AT&T to make any purchase of facilities or services from Southwestern Bell, or a commitment by AT&T as to any present or future transaction. The information provided shall not bind either party unless the terms are included in a completed, written contract executed by each party's authorized representative; any investment made or action taken by either party in anticipation of a contract shall be at that party's sole risk and expense.

AT&T Proprietary
Subject to the terms and conditions of the
AT&T and SWB 4/1/96 Confidentiality and Nondisclosure Agreement

NEG 008069

ATTACHMENT 22

Date: February 5, 1997

Memo To: Ralph Scargall

Re: Project Planning for AT&T/SWBT Consumer EASE/CNA Implementation

This letter is a follow-up to our initial joint Consumer EASE project planning meeting held in Dallas on January 30, 1997. As we discussed in our meeting, a joint project management structure needs to be put in place that will keep us on track to meet the timeline reviewed during our meeting. A mutual understanding of all issues, action items or areas of agreement will be a critical factor in our success. Therefore, this letter reflects our understanding of what was discussed at the meeting.

Objective

Initiate project planning discussions for AT&T's consumer market entry utilizing SWBT Consumer EASE and CNA operational platforms.

SWBT was not prepared to discuss CNA implementation at the meeting. SWBT's understanding of the meeting was to only discuss EASE implementation.

AT&T clarified that the objective of the team was to jointly manage all AT&T/SWBT interfaces necessary for market entry.

Functional Teams

The following functional teams and team leaders were agreed upon.

1. Connectivity

AT&T - Andy Slote

SWBT - Sue Eiffert/Mike Morris

2. EASE System Administration

AT&T - Andy Slote

SWBT - Greg Schlake

Kevin Tollelson (System Ids)

3. Training

AT&T - Mike Ware (Note - This needs to be changed to Linda Lipinski.)

SWBT - Jan Rogers

4. SWBT Order Return Feed

AT&T - Andy Slote
SWBT - Jerry Thomas

5. Manual Processes

AT&T - John Powell (Note - This needs to be changed to Judy
Entzminger.)
SWBT - Sharon Litke

6. Operator Services/Directory Assistance

AT&T - Jim McFelea (Note - This needs to be changed to Julie Cooper)
SWBT - Nathan Sparks

7. Maintenance

AT&T - Kedar Sant
SWBT - Randy Gurley

8. Billing

AT&T - Shirley Craig
SWBT - Nathan Sparks

Timeline

AT&T outlined its high level consumer market entry timeline as follows:

1/27/97	EASE Train the Trainer
1/30/97	Form AT&T/SWBT Joint Implementation Team
2/06/97	Obtain EASE "Test" Access (30 logins) Obtain CNA "Test" Access (10 logins)
3/01/97	Complete Documentation of Manual Processes
3/03/97	SWBT Delivery of Order Return Feed (BU340)
4/15/97	EASE Training - Database Access Full Circle Test Orders - Production "Dummy Orders" Train the Trainer #2
5/20/97	Production Tests Begin

SWBT stated that it appeared that the timeline AT&T presented could be met.

Volumes

SWBT stated that their predominant utilization of EASE was during the weekday from 8:00 am to 6:00 pm. The peak period was early am on Mondays and days after long holiday weekends.

AT&T stated that its usage of EASE would be predominantly after 5:00 pm through its telemarketing efforts to obtain customers. Current forecast would result in a ramp up to approximately 1000 service representatives accessing EASE by 4Q97.

The teams will review the volume projections for impacts to EASE. SWBT's quality objective for EASE is to maintain a minimum of a 3 second response time in moving from one EASE screen to another. SWBT stated that any capacity increases for EASE, if required, could be handled within a two month period. Due to the different AT&T and SWBT peak periods, SWBT indicated that there may not be a capacity issue. If a capacity issue surfaces, SWBT agreed to notify AT&T.

Costs

SWBT stated that cost recovery is being considered by SWBT and will be addressed in Austin by SWBT's negotiation team. AT&T expressed concern about any costs related to using EASE. AT&T's planning was based on the fact that there would be no costs related to using EASE. AT&T stated this issue needs to be addressed before we can proceed much further with implementation.

Action Items

1. Ralph Scargall to investigate broadening SWBT's participation to include CNA and other operational areas in addition to EASE.
2. AT&T requested facility diversity and redundancy. SWBT stated this can be addressed. The Connectivity sub-team will work this issue.
3. AT&T requested further EASE training documentation. SWBT stated they will provide more materials, e.g., reference guide, FID listings and acronym lists. The Training sub-team will work this issue.
4. AT&T requested 30 database Ids for EASE training. SWBT stated this was not a problem. AT&T will provide SWBT information such as name, address, telephone number, and TCP/IP address to establish the IDs.
5. AT&T will identify a product/marketing contact for SWBT to provide notification of new SWBT product offers.

6. AT&T suggested this team to address the issue of SWBT branding and/or routing OS/DA calls to AT&T's operator platform in a TSR environment. SWBT to verify that customized routing was agreed upon during negotiations. **(Nathan Sparks contacted Surendra Saboo and verified that customized routing of OS/DA was available in a TSR environment.)**
7. SWBT to investigate their position on costs related to AT&T utilizing EASE.
8. AT&T requested limited access to SORD for supplementing pending orders. SWBT to investigate the possibility of either a direct access to SORD or enhancing EASE to provide capability for supplementing orders (A-orders).

I have also attached an agenda for our conference call today. If you have any questions about the items listed in this letter, please give me a call or we can discuss on our conference call.

John Powell

ATTACHMENT 23